DEFENDANT'S EXHIBIT B

VERIFICATION

STATE OF Texas)
) ss.
COUNTY OF Smith)

The undersigned hereby certifies that the undersigned is Pamela Ann Sorrells, and that she has read the foregoing Responses to Requests for Admission, Answers to Interrogatories, and ~~Requests for Production~~ the responses contained therein are true and correct to the best of her knowledge, information and belief.

PAMELA ANN SORRELLS

SUBSCRIBED and SWORN to before me this 9th day of August, 2021.

Notary Public

My Commission Expires:
1/15/2025

EMMA CHOICE
Notary Public, State of Texas
Comm. Expires 01-15-2025
Notary ID 132873434

23. Admit that the statements from the records of Rex Venture Group, LLC d/b/a www.ZeekRewards.com, attached hereto as Appendix B, show that you received commission payments from "RPP "Profit Share", Non-Subscription Matrix Payments, Diamond Pool, and Subscription Matrix Payments.

RESPONSE: "Admit. Your Exhibit B does show those titles under "Commission Payments" and the amounts disbursed to me. I do not possess independent verification."

24. Admit that the funds and/or transfers you received from Rex Venture Group, LLC d/b/a www.ZeekRewards.com were fraudulent transfers.

RESPONSE: "Deny. I had no idea that the payments made to me were, or could be, fraudulent".

25. Admit that the Order Granting Motion for Summary Judgment in *Bell* v. *Disner*, Case 3:14 - cv-00091-GCM (W.D.N.C. 2014), found that the transfers from the ZeekRewards Ponzi scheme were fraudulent.

RESPONSE: "Admitted. I do understand that's what the North Carolina court said.'

26. Admit that you knew you were violating federal securities laws by your participation in ZeekRewards Ponzi scheme.

RESPONSE: "Denied. I did not know that I was violating any laws by participating in Zeek. None of us knew anything was wrong until it was shut-down all-of-a-sudden."

27. Admit that you willingly participated in Rex Venture Group, LLC d/b/a www.ZeekRewards.com because it was financially profitable for you.

RESPONSE: "Denied in part. I got into it because it allowed me to purchase household items a good prices. While it was set up differently (ie: penny actions) I thought that it was along the lines of Mary K.
I certainly hoped that it would be financially beneficial to me".

7. Please describe in detail (i) your educational background, including but not limited to any and all degrees and professional certifications (ii) your employment background including, for each place of employment, your job title and the responsibilities you had and (iii) any entities in which you currently have, or previously held, a financial interest in, the nature of your association (i.e. president, board member, etc.), and your responsibilities with such entity.

RESPONSE: **I have a high school education. I currently have a position in the County Auditor's Office for Cass County. I'm an assistant auditor. Most of my past employment has been clerical in nature.**

8. Please describe in detail your investment history, including, but not limited to, stocks, bonds, private investments, loans you made, and or any other type of investment you have made in the past or presently hold, specifically excluding savings and checking accounts, and for each identify the applicable dates, and your expected or promised and actual rate(s) of returns received for each year such investment was held, and identify any documents relating to the same.

RESPONSE: **None, other than a 401k plan with a previous employer.**

9. Please describe in detail any other multi-level marketing programs or schemes you have been involved in either preceding or subsequent to your involvement in ZeekRewards.

RESPONSE: **As previously stated, I was once involved in MaryK in a small way. I just used the products. Currently, I'm a member with Melaleuca. It's a wellness products company.**